



K073033

Legacy System Dental Implants  
With HA Coating  
Traditional 510(K) Submission

**510(K) Summary (21CFR 807.92(a))**

**1. Submitter's Information**

**Company Name:** Implant Direct LLC  
**Address:** 27030 Malibu Hills Rd., Calabasas Hills, CA USA 91301  
**Telephone Number:** 818-444-3300  
**Fax Number:** 818-444-3400  
**Registration Number:** 3001617766  
**Contact Person:** Tom Gottenbos  
**Date Summary Prepared:** October 11, 2007  
**Classification Name:** Implant, Dental, Endosseous  
**Common/Usual Name:** Endosseous Dental Implant

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**2. Device Trade Name:** Legacy System Dental Implants With HA Coating

**3. Predicate Device(s):** Zimmer Dental Tapered Screw-Vent Dental Implant System (K013277) and Implant Direct's Spectra-System (K061319)

**4. Device Description:**

The Legacy System consists of tapered screw-type endosseous implants with the same standard "V" thread configuration, the same 2mm of mini-threads near the top of each implant, are manufactured using the same medical grade titanium alloy material and are coated with the same soluble blast media (SBM) blasted surface treatment or HA plasma sprayed. The HA coated variety of these implants are the subject of this submission

**5. Intended Use:**

The intended use of the Legacy System Implants with HA Coating is identical to the intended use of the predicate abutments. These implants are two-piece implants for single-stage or two-stage surgical procedures. The Legacy implants are intended for use in the mandible and maxilla, in support of single or multiple-unit cement or screw receiving fixed restorations and for retention and support of overdentures. The implants are intended for immediate placement and function for support of single tooth and/or multiple tooth restorations, recognizing bone stability and appropriate occlusal load requirements.

**6. Device Comparison:**

Legacy System Dental Implants With HA Coating compare favorably to similar devices found within the cited predicates. The implants within this submission are used in an identical function as the cited predicates. The implants within this submission have nearly identical technological characteristics, intended use, and materials used in manufacture as the cited predicates



27030 Malibu Hills Road Calabasas Hills CA USA 91301 • 818.444.3317



## DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

DEC 10 2007

Mr. Thomas Gottenbos  
Vice-President, IT / Regulatory Affairs  
Implant Direct, LLC  
27030 Malibu Hills Road  
Calabasas Hills, California 91301

Re: K073033

Trade/Device Name: Legacy Dental Implants With HA Coating  
Regulation Number: 21 CFR 872.3640  
Regulation Name: Endosseous Dental Implant  
Regulatory Class: II  
Product Code: DZE  
Dated: October 15, 2007  
Received: October 26, 2007

Dear Mr. Gottenbos:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21 CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (240) 276-3150 or at its Internet address <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,



Chiu Lin, Ph.D.

Director

Division of Anesthesiology, General Hospital,  
Infection Control and Dental Devices

Office of Device Evaluation

Center for Devices and  
Radiological Health

Enclosure

K073033

## Indications for Use

510(k) Number (if known): K073033

Device Name: Legacy Dental Implants With HA Coating

Indications for Use:

The Legacy Dental Implant with HA coating is a dental implant fixture that is a part of a two-piece implant system. The Legacy implants are intended for use in the mandible and maxilla, in support of single or multiple-unit cement or screw receiving fixed restorations and for retention and support of overdentures. The implants are intended for immediate placement and function for support of single tooth and/or multiple tooth restorations, recognizing bone stability and appropriate occlusal load requirements.

Prescription Use X AND/OR Over-The-Counter Use \_\_\_\_\_  
(Part 21 CFR 801 Subpart D) (21 CFR 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE  
OF NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

Susan Runo

(Division Sign-Off)

Division of Anesthesiology, General Hospital  
Infection Control, Dental Devices

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